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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92062714
Party	Defendant Zheng Cai DBA Tai Chi Green Tea Inc
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Date	02/02/2016
Attachments	Response to Cancellation Appeal by Tai Chis last argument.pdf(219943 bytes)



In the United States Patent and Trademark Office Before the Trademark Trial and Appeal Board

Tai Chi Green Tea Inc

Registrant of Reg. NO. 4,114,136 (Cancellation No. 92062714)

Cai, Zheng

Registrant,

V.

Diamond Hong, Inc & H & C Trading Co. Inc.

Registrant Of Reg. No. 3,966,518

Petitioner

Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of Trade Mark "Wu Dang Tai Chi Green Tea"

Dear Sir/Madam,

We found that the argument in the motion the petitioner filed on Jan 12th, 2016 is totally pointless and only a continuation of "arguing for argument's sake". The petitioner completely fails to acknowledge the fact that the evidence we listed in our response (we filed with Trademark Office on Dec 30, 2015) clearly prove that each of all their relevant arguments against our mark are completely groundless. We believe that the Trademark Trial and Appeal Board will firmly deny the petitioner's appeal based on our response filed with the Trademark Office on Dec 30, 2015. Therefore we believe we do not need to repeat our answers to the petitioner's appeal here to waste the Trademark Trial and Appeal Board's precious time.

Respectfully submitted

By _____
Zheng Cai

Owner of Wu Dang Tai Chi Green Tea, Reg. NO. 4,114,136.
352 S Barnswallow Lane, Vernon Hills, IL 60061
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Email: zanecai@yahoo.com

Dated: Feb 2rd, 2016

Certificate of Service

I hereby certify that a copy of the foregoing **Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of Trade Mark "Wu Dang Tai Chi Green Tea"** was served on:

Kenneth Cang Li
Law Offices of Kenneth Cang Li
1745 Broadway, 17th Floor,
New York, NY 10019 United States

By placing same with the U. S. Postal Service, Via first class mail, postage pre-paid, this 2rd Day of February, 2016

By _____
Name _____
(Print out)

Certificate of Electronic Service

It is hereby certified that the foregoing **Motion to Deny the Petitioner's Appeal for Default Judgement for the Cancellation of Trademark "Wu Dang Tai Chi Green Tea"** was served electronically at <http://estta.uspto.gov> on this 2rd day of February, 2016

By _____

Name _____